



**7999 N Federal Highway, Suite 400  
Boca Raton, FL 33487**

January 29, 2010

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

Re: **EB Docket No. 06-36  
Annual 47 C.F.R 64.2009(e) CPNI Certification for 2009**

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of FCC rules, submitted herewith on behalf of Globaltel LD, Inc d/b/a American Roaming Network, is the carrier's 2009 CPNI certification with accompanying statement.

Should any questions arise regarding this submission, please contact the undersigned.

Sincerely yours,

Milton Volz, III  
President

Enclosure

Cc: Best Copy Printing, Inc.

**Annual 47 C.F.R. §64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009 covering the prior calendar year 2009.

Date Filed: January 29, 2010

Name of company covered by this certification: GlobalTel LD, Inc. d/b/a American Roaming Network

Form 499 Filer ID: 818016

Name of Signatory: Milton Volz

Title of signatory: President

I, Milton Volz, certify that I am an officer of the company named above, and, acting as an agent for the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*

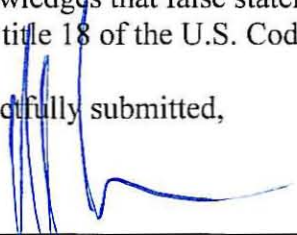
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.R.F. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statement and misrepresentations to the Commission are punishable under title 18 of the U.S. Code and may subject it to enforcement action.

Respectfully submitted,

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Milton Volz, President  
GlobalTel LD, Inc. d/b/a American Roaming Network

**GlobalTel LD, Inc. d/b/a American Roaming Network**  
**Description of CPNI Policies and Procedures**

ARN has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that ARN is compliance with the FCC's customer proprietary network information ("CPNI") rules. This statement is summary of ARN's policies and procedures designed to safeguard CPNI.

Specifically, ARN has ensured that its customer service employees do not have any access to customer data for any purpose. ARN does not have access to customer information in general, but rather renders the billing information for its calls directly to the wireless carrier providing the connection or to its own billing agent, BSG Clearing. ARN does maintain customer data on premises relating to its credit card transactions, and complies with all privacy requirements dictated by its processing agreements. Further, ARN has outsourced all billing and most customer service functions to a third party clearinghouse, BSG Clearing. ARN's in-house customer service only provides rate information or responds to requests for prepaid services paid by credit card. These customer service representatives do not have any access to customer data or call records. ARN has obtained verification from its third party clearinghouse that it complies with the FCC's CPNI requirements.

ARN, through its billing vendor, uses CPNI for the limited purposes of initiating, rendering, billing, and collecting telecommunications services, and may use CPNI, if necessary, to protect its property rights. ARN does not use any CPNI for any marketing purposes. Nor does ARN disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

ARN trains its personnel in the use of CPNI, and explains that its customer service personnel do not have access to CPNI. ARN has an express disciplinary process in place for any improper use of CPNI.

ARN has implemented measures to discover and to protect against unauthorized attempts to access CPNI. ARN also has implemented procedures pursuant to which it will track breaches of CPNI (and will be notified by its clearinghouse of any such breaches), and it will notify the United States Secret Service and the Federal Bureau of Investigation. ARN will notify its customers (if permitted) of the security breach, and will notify of the breaches and notifications for a two-year period.

ARN will track customer complaints regarding CPNI.

